

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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UNITED STATES OF AMERICA)
) No. 2:16-cr-84-1
v.)
)
ALISON GU, a/k/a "Alison Ling," "Ally Koo,")
"Ai J. Chen," "Ai Jen Chen," "Ai Chen,")
"Jing Shao," "Yijing Gu," "Yijing Lin,")
"Alison Yi Gu," and)
MATTHEW ABEL,)

Defendants.

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT ONE

1. At all relevant times, Bank of Bennington, First National Bank of America, Prime Lending/Colonial Savings Bank, Discover Home Loans, and Emigrant Mortgage Company were financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation. As financial institutions, they offered customers mortgages and other loans, which customers could use to finance, re-finance, or improve real property.

2. Between in or about 2013 and September 2015, defendants Alison Gu, a/k/a "Ally Koo," "Ai J. Chen," "Ai Jen Chen," "Ai Chen," "Jing Shao," and Matthew Abel devised and executed a scheme to defraud Bank of Bennington, First National Bank of America, Prime Lending/Colonial Savings Bank, Discover Home Loans, and Emigrant Mortgage Company to obtain funds through submission of mortgage loan applications and re-financing applications containing false information to Bank of Bennington, First National Bank of America, Prime

Lending/Colonial Savings Bank, Discover Home Loans, and Emigrant Mortgage Company.

3. It was part of the scheme that on or about August 13, 2013, Matthew Abel incorporated “Ramps Unlimited, Inc.” in Connecticut, which corporation purchased real property located at 7 Edith Place, Cheshire, Connecticut on or about August 21, 2013.

4. It was further part of the scheme that between approximately August 2014 and January 2015, Alison Gu, a/k/a “Ally Koo,” “Ai J. Chen,” “Ai Jen Chen,” “Ai Chen,” “Jing Shao” attempted to purchase 7 Edith Place, Cheshire Connecticut by submitting a financing application to NorthEast Financial using the identity of “Ai J. Chen.” The financing application to NorthEast Financial also falsely represented that “Ai J. Chen” was currently employed at Alexion Pharmaceuticals in Cheshire, Connecticut.

5. It was further part of the scheme that on or about February 26, 2015, Matthew Abel, acting as the agent of Ramps Unlimited, Inc., transferred 7 Edith Place, Cheshire, Connecticut to “Aijen Chen” and “Jing Shao” by quitclaim deed for no consideration.

6. It was further part of the scheme that Alison Gu, a/k/a “Ally Koo,” “Ai J. Chen,” “Ai Jen Chen,” “Ai Chen,” “Jing Shao” established false identities using the Social Security Number of a deceased individual and applied with Matthew Abel for loans from Bank of Bennington, Discover Home Loans, and First National Bank of America.

7. It was further part of the scheme that in or about June 2015, Matthew Abel initiated a mortgage application to Bank of Bennington and subsequently substituted “Ai J. Chen” as the record purchaser for property at 389 Read Farm Road, Dorset, Vermont.

8. It was further part of the scheme that in or about September 2015, Alison Gu, a/k/a “Ally Koo,” “Ai J. Chen,” “Ai Jen Chen,” “Ai Chen,” “Jing Shao,” submitted to Bank of Bennington altered bank statements, forged employment identification forms, forged pay

statements, and a forged IRS W-2 form.

9. It was further part of the scheme that on or about September 28, 2015, Alison Gu, a/k/a "Ally Koo," "Ai J. Chen," "Ai Jen Chen," "Ai Chen," "Jing Shao" obtained a mortgage loan of approximately \$417,000 from the Bank of Bennington.

10. It was further part of the scheme that in or about July and August 2015, Alison Gu, a/k/a "Ally Koo," "Ai J. Chen," "Ai Jen Chen," "Ai Chen," "Jing Shao," and Matthew Abel submitted to First National Bank of America altered bank statements, forged employment identification forms, forged pay statements, and a forged IRS W-2 form in the application to finance the purchase of property at 385 Cedar Avenue, Cocoa Beach, Florida.

11. It was further part of the scheme that on or about August 7, 2015, Alison Gu, a/k/a "Ally Koo," "Ai J. Chen," "Ai Jen Chen," "Ai Chen," "Jing Shao," and Matthew Abel obtained a mortgage loan of approximately \$230,250 from First National Bank of America.

12. It was further part of the scheme that between in or about March and May 2015, Alison Gu, a/k/a "Ally Koo," "Ai J. Chen," "Ai Jen Chen," "Ai Chen," "Jing Shao," submitted to Emigrant Mortgage Company an application in the names of "Aijen Chen" and "Jing Shao" for a cash-out re-financing of property located at 7 Edith Place, Cheshire, Connecticut. The application contained false information with respect to the actual identities of the loan applicants, a forged signature of a United States consular official in Beijing, China purporting to vest power of attorney in the name of one of the loan applicants, false visa identification information, and a false certification of a non-existent accountant in China purporting to verify "Aijen Chen's" income.

13. It was further part of the scheme that on or about May 29, 2015, Alison Gu, a/k/a "Ally Koo," "Ai J. Chen," "Ai Jen Chen," "Ai Chen," "Jing Shao," obtained a loan from

Emigrant Mortgage Company of approximately \$392,000.

14. It was further part of the scheme that on or about April 11, 2015, “Ai Chen” submitted a purchase contract to Discover Home Loans to finance the purchase of property at 2406 Riverside Farms Road, Austin Texas. It was further part of the scheme that on or about April 21, 2015, the purchase contract was amended to change the purchaser from “Ai Chen” to Matthew Abel. It was further part of the scheme that Matthew Abel failed to disclose to Discover Home Loans that he was undergoing the financing process to purchase a property at 184 South Sea Avenue, Unit 1, Yarmouth, Massachusetts.

15. It was further part of the scheme that on or about May 19, 2015, Matthew Abel obtained a mortgage loan of approximately \$336,996 from Discover Home Loans.

16. It was further part of the scheme that, between July and December 2015, monthly mortgage payments were made in connection with the property at 2406 Riverside Farms Road, Austin Texas from a bank account maintained by “Ai J Chen” at Citizens Bank.

17. It was further part of the scheme that on or about April and May 2015, Matthew Abel applied for financing with Prime Lending/Colonial Savings to purchase a property at 184 South Sea Avenue, Unit 1, Yarmouth, Massachusetts. It was further part of the scheme that Matthew Abel failed to disclose to Prime Lending/Colonial Savings the existence of the prior mortgage debt obligation regarding the property at 2406 Riverside Farms Road, Austin Texas.

18. It was further part of the scheme that on or about May 22, 2015, Matthew Abel obtained a mortgage loan of approximately \$266,750 from Prime Lending/Colonial Savings.

19. It was further part of the scheme that, between August and December 2015, monthly mortgage payments were made in connection with the property at 184 South Sea Avenue, Unit 1, Yarmouth, Massachusetts from a bank account maintained by “Ai J Chen” at

Citizens Bank.

(18 U.S.C. §§ 1344(1) & 2)

COUNT TWO

On or about March 27, 2015, in the District of Vermont, the defendant, Alison Gu, a/k/a "Ally Koo," willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws.

(18 U.S.C. § 1542)

COUNT THREE

On or about March 27, 2015, in the District of Vermont, the defendant, Alison Gu, a/k/a “Ally Koo,” knowingly possessed or used, without lawful authority, a means of identification of another person during and in relation to making a false statement in an application for a passport, as alleged in Count Two, knowing that the means of identification belonged to another actual person.

(18 U.S.C. § 1028A(a)(1))

FORFEITURE NOTICE

1. The allegations contained in Count One of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 982(a)(2).

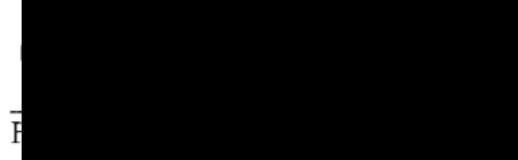
2. Pursuant to 18 U.S.C. § 982(a)(2), upon conviction of a violation of 18 U.S.C. § 1344 affecting a financial institution, the defendants Alison Gu, a/k/a ““Ally Koo,”” “Ai J. Chen,” “Ai Jen Chen,” “Ai Chen,” “Jing Shao,” and Matthew Abel shall forfeit to the United States of America any property real or personal that constitutes, or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offense of which the defendant is convicted, or that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the defendant is convicted. The property to be forfeited includes, but is not limited to, the following: 389 Read Farm Road, Dorset, Vermont 05253; 385 Cedar Avenue, Cocoa Beach, Florida 32931; 6 Old Snow Valley Road, Winhall, Vermont 05340; 184 South Sea Avenue, Unit #1, West Yarmouth, Massachusetts 02673; 2406 Riverside Farms Road, Austin, Texas 78741; 7 Edith Place, Cheshire, Connecticut 06410; and United States funds in the amount of the gross proceeds obtained as a result of the violation.

3. If any forfeitable property described above, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to the forfeiture of substitute property, including but not limited to 389 Read Farm Road, Dorset, Vermont 05253; 385 Cedar Avenue, Cocoa Beach, Florida 32931; 6 Old Snow Valley Road, Winhall, Vermont 05340; 184 South Sea Avenue, Unit #1, West Yarmouth, Massachusetts 02673; 2406 Riverside Farms Road, Austin, Texas 78741; 7 Edith Place, Cheshire, Connecticut 06410, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

A TRUE BILL



Eric S. Miller
ERIC S. MILLER (KJD)
United States Attorney
Burlington, Vermont
July 19, 2016